GEO Engineering

150 Mineral Spring Drive
Dover, New Jersey 07801
Phone (201) 361-3600
FAX (201) 361-3800

LETTER OF TRANSMITTAL

Date: 4/17/96	Job No.: 94039 T6
Attention: Joseph J. Nowak	
Re: Hexcel Corporation	
Lodi Borough, Bergen County, NJ	
ISRA Case No. 86009	

To: NJDEP-BEECRA
401 East State Street
Trenton, NJ 08625

WE ENCLOSE THE FOLLOWING:

VIA: ☐ Courier /Hand Delivered ☒ Overnight Express ☐ First Class Mail ☐

COPIES	DATE	DESCRIPTION
		Hexcel Corporation's Request (4/12/96) for Waste Flow Exemption for Soil

Remarks:

SIGNED: Kevin M. Greener

COPY TO: Bergen County Solid Waste Coordinator
A. William Nosil
File

If enclosures are not as noted, kindly notify us at once.

HEXCEL

April 12, 1996

New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
Trenton, New Jersey 08625

Attn: Mr. Joseph Nowak

Re: Request for Waste Flow Exemption for Soil From Former Hexcel Facility, Lodi, NJ

Dear Mr. Nowak:

This is to request an exemption from waste flow requirements to allow for the recycling of contaminated soil from the Hexcel facility. Approximately 100 tons of contaminated, ID 27 soil was generated during the sewer line installation. We are proposing that this material be transported to a thermal treatment facility operated by Purgo, Inc. in Virginia for treatment and reuse.

In accordance with the NJDEP's "Management of Excavated Soils" Guidance Document dated May 14, 1993, the following information is attached to this transmittal, a copy of which has been sent to the Bergen County Solid Waste Coordinator.

- Attachment 1 is a copy of the analytic results from the waste characterization sampling of the soil. The analyses consisted of full TCLP and RCRA characteristics, and PCB and petroleum hydrocarbon analysis. Sampling was performed consistent with Appendix 1 of the NJDEP Waste Classification Request Form. All results were below regulatory limits for hazardous waste, including Total Petroleum Hydrocarbons, which were below 30,000 ppm.

- Attachment 2 is a letter from Purgo stating that they agree to accept the material, the timeframe for treatment and their intention and method for beneficial reuse.

- Attachment 3 is a copy of the current facility permit for Purgo which certifies that the facility is operating in accordance with applicable regulations and can accept the soils for treatment.

Hexcel Corporation
5794 West Las Positas Blvd., P.O. Box 8181, Pleasanton, CA 94588-8781 • (510) 847-9500

As per the Guidance Document, a copy of the bill of lading documenting receipt of the soil at the disposal facility will be sent to the NJDEP and the Bergen County Solid Waste Coordinator.

Should any further information or clarification be required, please contact the undersigned at (510) 847-9500 ext. 4482.

Very truly yours,

A. William Nosil
Corporate Environmental Engineering Manager

AWN:pdh
Enclosures

Attachment 1

ENVIROTECH RESEARCH, INC.

Client ID: Composite
Site: Former Hexcel Site

Lab Sample No: 36125
Lab Job No: L166

Date Sampled: 12-11-95
Date Received: 12-11-95
Date Prepped: 12-13-95
Date Analyzed: 12-14-95
Lab File ID: d4371.d

Leachate Volume: 5.0
Dilution Factor: 1.0
GC Column: DB624
Instrument ID: VOAMS4

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

VOLATILE ORGANICS - GC/MS

Parameter	Analytical Result Units: mg/l	Regulatory Level Units: mg/l	Quantitation Limit Units: mg/l
Vinyl Chloride	ND	0.2	0.001
1,1-Dichloroethene	ND	0.7	0.001
Chloroform	ND	6.0	0.001
1,2 Dichloroethane	ND	0.5	0.001
Methyl Ethyl Ketone	ND	200	0.005
Carbon Tetrachloride	ND	0.5	0.001
Trichloroethene	0.005	0.5	0.001
Benzene	ND	0.5	0.001
Tetrachloroethene	0.006	0.7	0.001
Chlorobenzene	ND	100	0.001

ENVIROTECH RESEARCH, INC.

Client ID: Composite
Site: Former Hexcel Site

Lab Sample No: 36125
Lab Job No: L166

Date Sampled: 12-11-95
Date Received: 12-11-95
Date Prepped: 12-13-95
Date Extracted: 12-14-95
Date Analyzed: 12-14-95
Lab File ID: t3296.d

Leachate Volume: 250.0
Extract Final Volume: 2.0 ml
Dilution Factor: 1.0
GC Column: DB-5
Instrument ID: BNAMS3

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EXTRACTABLE ORGANICS

Parameter	Analytical Result Units: mg/l	Regulatory Level Units: mg/l	Quantitation Limit Units: mg/l
o-Cresol	ND	200(a)	0.040
m&p-Cresol	ND	200(a)	0.040
2,4,6 Trichlorophenol	ND	2.0	0.040
2,4,5-Trichlorophenol	ND	400	0.040
Pentachlorophenol	ND	100	0.080
1,4-Dichlorobenzene	ND	7.5	0.040
Hexachloroethane	ND	3.0	0.040
Nitrobenzene	ND	2.0	0.040
Hexachlorobutadiene	ND	0.5	0.040
2,4-Dinitrotoluene	ND	0.13	0.040
Hexachlorobenzene	ND	0.13	0.040
Pyridine	ND	5.0	0.040

(a) If o-, m-, and p-cresol concentration can not be differentiated, the total cresol concentration is used. The regulatory level of total cresol is 200 mg/l.

ENVIROTECH RESEARCH, INC.

Client ID: Composite
Site: Former Hexcel Site

Lab Sample ID: 36125
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Date Prepped: 12/14/95
Date Extracted: 12/14/95
Date Analyzed: 12/14/95
Lab File ID: zr008053.d

Leachate Volume: 15 ml
Extract Final Volume: 5.0 ml
Dilution Factor: 1.0
GC Column: DB-608
Instrument ID: PESTGC3.i

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
ORGANOCHLORINE HERBICIDES

Parameter	Analytical Result Units: mg/l	Regulatory Level Units: mg/l	Quantitation Limit Units: mg/l
2,4-D	ND	10.0	0.0080
2,4,5-TP (Silvex)	ND	1.0	0.0080
2,4,5-T	ND	-	0.0080

ENVIROTECH RESEARCH, INC.

Client ID: Composite
Site: Former Hexcel Site

Lab Sample No: 36125
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Date Prepped: 12/13/95
Date Extracted: 12/14/95
Date Analyzed: 12/15/95

Leachate Volume: 100 ml
Extract Final Volume: 5 ml
Dilution Factor: 1.0
Lab File ID: YR005533
Instrument ID: PESTGC#2

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

PESTICIDES

Parameter	Analytical Result Units: mg/l	Regulatory Level Units: mg/l	Quantitation Limit Units: mg/l
Chlordane	ND	0.03	0.01
Endrin	ND	0.02	0.001
Heptachlor	ND	0.008 (b)	0.001
Heptachlor epoxide	ND	0.008 (b)	0.001
Lindane (gamma-BHC)	ND	0.4	0.001
Methoxychlor	ND	10.0	0.001
Toxaphene	ND	0.5	0.01

(b) The regulatory level for heptachlor and heptachlor epoxide is for the total of both compounds.

ENVIROTECH RESEARCH, INC.

Client ID: Composite
Site: Former Hexcel Site

Lab Sample ID: 36125
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Date Extracted: 12/12/95
Date Analyzed: 12/13/95
GC Column: DB-608
Instrument ID: PESTGC3.i
Lab File ID: zr008007.d

Matrix: SOIL
Level: LOW
Sample Weight: 30 g
Extract Final Volume: 10.0 ml
Dilution Factor: 1.0
% Moisture: 10

ORGANOCHLORINE PCBs - GC/ECD
METHOD 8080

Parameter	Analytical Results Units: ug/kg (Dry Weight)	Method Detection Limit Units: ug/kg
Aroclor-1016	ND	74
Aroclor-1221	ND	74
Aroclor 1232	ND	74
Aroclor-1242	ND	74
Aroclor-1248	ND	74
Aroclor-1254	ND	74
Aroclor-1260	ND	74

ENVIROTECH RESEARCH, INC.

Client ID: Composite
Site: Former Hexcel Site

Lab Sample No: 36125
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95

Matrix: LEACHATE
Level: LOW

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

METALS ANALYSIS

Analyte	Analytical Result Units: mg/l	Regulatory Level Units: mg/l	Instrument Detection Limit	Qual	M
Arsenic	ND	5.0	0.029		P
Barium	12.8	100.0	0.00070		P
Cadmium	ND	1.0	0.0039		P
Chromium	ND	5.0	0.0080		P
Lead	ND	5.0	0.060		P
Mercury	ND	0.2	0.00010		CV
Selenium	ND	1.0	0.064		P
Silver	ND	5.0	0.0036		P

Qual Column - Data Reporting Qualifiers (See Sec 2 of Report)
M Column - Method Code (See Section 2 of Report)

Site: Former Hexcel Site

Lab Job No: 1166

Date Sampled: 12/11/95
Date Received: 12/11/95
Matrix: SOIL

Date Analyzed: 12/13/95
QA Batch: 1392

CORROSIVITY (pH)

Envirotech Sample #	Client ID	Analytical Result Units: std units
36125	Composite	7.64

ENVIROTECH RESEARCH, INC.

Site: Former Hexcel Site
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Matrix: SOIL
Date Analyzed: 12/13/95
QA Batch: 1220

IGNITABILITY

Envirotech Sample #	Client ID	Flashpoint Units: deg F
36125	Composite	>160°F

ENVIROTECH RESEARCH, INC.

Site: Former Hexcel Site

Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Matrix: SOIL

Date Extracted: 12/13/95
Date Analyzed: 12/13/95
QA Batch: 1236

REACTIVE CYANIDE

Envirotech Sample #	Client ID	Dilution Factor	Analytical Result Units: mg/kg
36125	Composite	2.0	ND

Quantitation Limit for Reactive Cyanide is 25.0 mg/kg

ENVIROTECH RESEARCH, INC.

Site: Former Hexcel Site
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Matrix: SOIL
Date Extracted: 12/13/95
Date Analyzed: 12/13/95
QA Batch: 1236

REACTIVE SULFIDE

Envirotech Sample #	Client ID	Dilution Factor	Analytical Result Units: mg/kg
36125	Composite	2.0	ND

Quantitation Limit for Reactive Sulfide is 20.0 mg/kg

ENVIROTECH RESEARCH, INC.

Site: Former Hexcel Site
Lab Job No: L166

Date Sampled: 12/11/95
Date Received: 12/11/95
Matrix: SOIL
Date Extracted: 12/13/95
Date Analyzed: 12/14/95
QA Batch: 3193

TOTAL PETROLEUM HYDROCARBONS

Envirotech Sample #	Client ID	% Moisture	Dilution Factor	Analytical Result mg/kg (Dry Wt.)
36125	Composite	9.5	1.0	210

Quantitation Limit for Total Petroleum Hydrocarbons is 25.0 mg/kg for an undiluted sample.

Attachment 2

Purgo Inc.
Environmental Services

April 4, 1996

Conti Environmental
Attn: John Czapor
3001 South Clinton Avenue
South Plainfield, New Jersey 07080

Dear John:

This letter is in response to your inquiry of the final disposition of soils processed at our licensed and bonded low temperature thermal desorption facility. Our process provides guaranteed results, efficiently removing and destroying hydrocarbons from soil. Upon completion of remediation, Purgo will issue a certificate of destruction, thus eliminating any future liability associated with the material. All soil received is remediated to less than 50 ppm total petroleum hydrocarbons, which is considered clean fill in Virginia and therefore is suitable for various recycling options. Since the soil in question is contaminated with a non-fuel source product, the remediated soil will be beneficially reused as cover for a landfill.

Thank you for considering Purgo for your soil remediation needs. I hope this information is helpful. Please call if you need additional information or if I may help in any way. I am,

Very Truly Yours,

Jay Perry

cc: Kevin Greener, GEO Environmental

11023 Washington Highway, Suite 100, Glen Allen, VA 23059
804-550-0400 • Toll Free 800-446-2614 • FAX 804-550-3833

Attachment 3

COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667
TDD (804) 371-8737

FEB 0 6 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert L. Carroll, PhD
President, Purgo, Inc.
5020 Monument Avenue, Suite 1
P.O. Box 6983
Richmond, Virginia 23230

Re: Proposed Thermal Treatment Facility, Former Weyerhauser Property, Hanover County

Dear Mr. Carroll:

Mr. Dean Starook of my staff enjoyed meeting you recently at the referenced site. We have reviewed submittals by Purgo, Inc. submitted under cover letters dated January 25, 1991 and December 21, 1990, and the Department of Air Pollution Control permit dated January 29, 1991 regarding the proposed facility. This facility consists of a 40,600 sq. ft. steel and sheet metal building and an adjacent 120,000 sq. ft. exterior concrete slab (hereafter termed "the facility"). This review was performed following the criteria contained in the Requirements for the Thermal Treatment of Petroleum Contaminated Soil, dated January 15, 1991. It is our understanding that the portable soil remediation plant developed by Thermotech Systems Corporation will arrive at the facility by February 7, 1991. Approval to begin operation of the facility is hereby granted subject to the following conditions:

1. The letter of credit submitted to fulfill the requirements of the Financial Assurance Regulations of Solid Waste Facilities (VR 672-20-1) differs from the wording found in Appendix 3.6 of VR 672-20-1. A revised letter of credit in accordance with the wording found in Appendix 3.6 of VR 672-20-1 or another financial assurance mechanism found in VR 672-20-1 must be submitted within 30 days of receipt of this letter. The amount of the letter of credit ($120,000) will restrict the allowable amount of contaminated soil at the facility to no greater than 2,000 tons. The financial assurance must be upgraded at the rate of $60.00 per ton prior to storing

greater than 2,000 tons at the facility.

2. Runoff from other areas of the property must be prevented from entering the facility. This will require regrading of some portions of the property and/or construction of concrete or asphalt berms along the perimeter of both the interior and exterior slab. These measures must be implemented prior to placing any soil on the exterior slab.

3. Purgo, Inc. will be responsible for the quality of all runoff leaving the contaminated soil storage area and the thermally treated soil storage area (interior and exterior slabs, respectively). The presence of contaminants in the runoff from the facility, regardless of their origin, will be suitable basis to require Purgo, Inc. to collect and treat the runoff or perform other remedial work at the facility.

4. Purgo, Inc. will be responsible for implementing suitable erosion and sediment control measures at the proposed facility in accordance with the Virginia Sediment & Erosion Control Handbook and applicable state and local ordinances.

5. Criteria for acceptance of soil at the facility will be based upon the Guidelines For The Disposal Of Soil Contaminated With Petroleum Products issued April 1, 1990, amended January 15, 1991, the Virginia Solid Waste Management Regulations VR 672-20-10, and any future amendments of same. In addition, contaminated soil from outside of Virginia must be accompanied by a certification that the soil is not a hazardous waste in the State in which it is generated. Testing of the thermally treated soil will be in accordance with Attachment I of Requirements For The Thermal Treatment of Petroleum Contaminated Soil issued January 15, 1991, and any future amendments of same.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

June 6, 1995

Peter W. Schmidt
Director

P.O. Box 10009
Richmond, Virginia 23240-0009
(804) 762-4000

Howard M. Turner
Vice President
Purgo Inc.
4906 Cutshaw Avenue, Suite 203
P.O. Box 6983
Richmond, Virginia 23230

Re: Permit by Rule #046 Amendment, Materials Recovery Facility
Thermal Treatment of Hydrocarbon Contaminated Soils
Hanover County, Virginia

Mr. Turner:

The Department has received one copy of an application for an amendment to the permit by rule of a Material Recovery Facility processing petroleum contaminated soil located at 17324 Washington Highway, Doswell, Virginia. The permit-by-rule was originally granted for all soil reclaimation facilities in accordance with §7.0.E.2.i. of the Virginia Solid Waste Management Regulations (VSWMR). This amendment includes the acceptance of materials other than soil which can be remediated using thermal treatment and that have been specifically identified in the facility's operational plan. The amendment request was received by the Department on March 3, 1995. The permit-by-rule has been updated per your request of May 22, 1995 to provide an operations manual that addresses the requirements for handling hydrocarbon contaminated soils and other media.

Attached to this letter are two documents which should not be separated from this letter for compliance purposes. The two documents are:

ATTACHMENT I. CONDITIONS OF THE PERMIT BY RULE STATUS

ATTACHMENT II. FACILITY DESCRIPTION

The purpose of this letter is to acknowledge receipt of the documentation submitted in accordance with the requirements of VSWMR §§ 7.0.E.2.d. and 7.0.E.2.e. of VR 672-20-10 for permit by rule facilities, and notifies you that the amendment of Permit by Rule (#046) is approved. Please note however, that in accordance

with VSWMR § 7.0.E.6 and the attached "Conditions of Permit By Rule Status", the Director may require changes in the documents designed to assure compliance with the standards of VSWMR Parts VI and VII, if applicable. Should such changes not be accomplished by the facility owner or operator, the Director may require the operator to submit the full permit application and to obtain a regular solid waste management facility permit.

Please note that it is the responsibility of Purgo Inc., to obtain any other permits or authorizations that may be necessary. If there are any questions, please contact Michael J. Dieter, Environmental Engineer Senior, at (804)527-5118.

Sincerely,

Peter W. Schmidt
For Director

PWS/mjd

c: Michael J. Dieter, DEQ
Ulysses Brown, DEQ

ATTACHMENT I
CONDITIONS OF THE PERMIT BY RULE STATUS

I. CHANGE OF OWNERSHIP

A permit by rule may not be transferred by the permittee to a new owner or operator. However, when the property transfer takes place without proper closure, the new owner shall notify the Department of the sale and fulfill all the requirements contained in §§ 7.0.E.1 through 7.0.E.3 of the Virginia Solid Waste Management Regulations (VR 672-20-10) with the exception of those dealing with financial assurance. Upon presentation of the financial assurance proof required by the Financial Assurance Regulations for Solid Waste Facilitates (VR 672-20-1) by the owner, the Department will release the old owner from his closure and financial responsibilities and acknowledge existence of the new permit by rule in the name of the new owner.

II. FACILITY MODIFICATIONS

The owner or operator of a facility operating under a permit by rule may modify its design and operation by furnishing the Department a new certificate prepared by the professional engineer and a new operational plan. Whenever modifications in the design or operation of the facility affect the provisions of the approved closure plan, the owner or operator shall also submit an amended closure plan. Should there be an increase in the closure costs, the owner or operator shall submit a new proof of financial responsibility as required by the VR 672-20-1.

III. LOSS OF PERMIT BY RULE STATUS

In the event that a facility operating under a permit by rule violates any applicable siting, design and construction, or closure provisions of Part VI, the owner or operator of the facility will be considered to be operating an unpermitted facility as provided for in § 2.6 of VR 672-20-10 and shall be required to either obtain a new permit as required by Part VII or close under Part V or VI of these regulations, as applicable.

IV. TERMINATION

The Director shall terminate permit by rule and shall require closure of the facility whenever he finds that:

a. As a result of changes in key personnel, the requirements necessary for a permit by rule are no longer satisfied;

b. The applicant has knowingly or willfully misrepresented or failed to disclose a material fact in his disclosure statement, or any other report or certification required under this regulation, or has knowingly or willfully failed to notify the Director of any material change to the information in the disclosure statement;

c. Any key personnel have been convicted of any of the crimes listed in § 10.1-1409 of the Code, punishable as felonies under the laws of the Commonwealth or the equivalent thereof under the laws of any other jurisdiction; or has been adjudged by an administrative agency or a court of competent jurisdiction to have violated the environmental protection laws of the United States, the Commonwealth or any other state and the Director determines that such conviction or adjudication is sufficiently probative of the permittee's inability or unwillingness to operate the facility in a lawful manner.

V. DOCUMENTS TO BE SUBMITTED TO THE DEPARTMENT

The following materials will need to be submitted to the Department:

a. If remediated soil is stored in piles outside the facility, proper approval from the local sediment and erosion control office is required.

b. If non-fuel source soils will be disposed of as clean fill after remediation, the facility will submit all applicable information to the Department for approval, otherwise, remediated soil may be disposed of in a sanitary landfill.